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April 21, 1994

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Reference: General Docket 90-314

Dear Mr. Caton:

Representatives of Motorola met with members of the PCS Task Force to discuss the pending reconsideration. Attached is written material discussed.

Regards,

Stuart E. Overby

Manager, Technical Programs

SEO:amdes

Attachment

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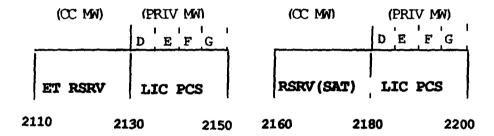
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CONCLUSIONS AT THIS POINT

- The market is unlikely to support more than 2 or 3 full service PCS licenses in addition to existing cellular and Esmr service
- Operation of PCS across both the 1.8 and 2.2 GHz bands is technically feasible but dual band subscriber units will raise cost to consumers by approximately 25%
- The presence of incumbent microwave systems has a significant impact on initiating service, especially for unlicensed PCS
- The FCC must harmonize its goals for PCS with the spectrum needs for global MSS service and U.S. leadership on MSS at WARC-92
- An FCC requirement for conformance to standards developed by an ANSI-accredited body will promote high volume, lower cost equipment and establish credibility of U.S. solutions in the global market
- 1.25 MHz channelization for unlicensed voice PCS provides a spectrally efficient means of accommodating various technologies
- Final wideband PCS decisions should be made expeditiously, with auctions commencing by year-end 1994

FCC PCS DECISION

(PRIV MW) :VC С A В ATAC l w С Α В RSRV (SAT) UNLICENSED PCS LICENSED PCS LICENSED PCS 1850 1890 1930 1970 1990



LICENSED PCS: UNLICENSED PCS: 120 MHZ 40 MHZ 40 MHZ

RESERVE (SATELLITE): 40 MHZ EMERGING TECHNOLOGY RESERVE: 20 MHZ 1992 WARC MOBILE SATELLITE ALLOCATIONS: REGION II: 1970-2010 UP; 2160-2200 DOWN WORLDWIDE: 1980-2010 UP; 2170-2200 DOWN

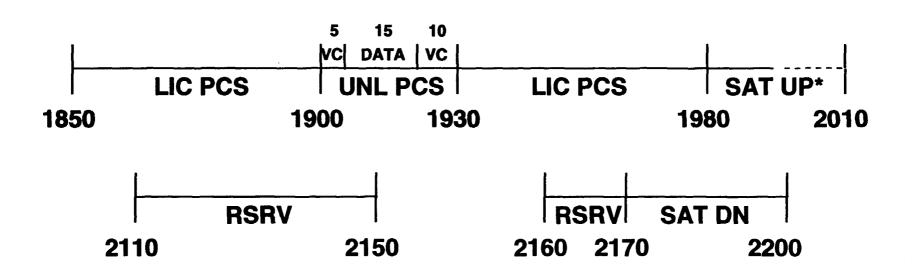
ABBREVIATION KEY:

CC MW = COMMON CARRIER MICROWAVE
PRIV MW = PRIVATE MICROWAVE
RSRV (SAT) = RESERVED IN ANTICIPATION OF MOBILE SAT NEEDS
ET RSRV = EMERGING TECHNOLOGY RESERVE— USE UNDESIGNATED
VC = VOICE

S OVERBY MOTOROLA 9-23-93



ALTERNATIVE PCS BANDPLAN FOR CONSIDERATION



LIC PCS 100 MHz ALL AT 1.8 GHz

UNLIC PCS 30 MHz ALL AT 1.8 GHz (15 MHz DATA, 15 MHz VOICE)

SAT 60 MHz ALL GLOBAL*

RSRV 50 MHz

*FCC must initiate action to make available the 1980-2010/2170-2200 MHz spectrum for satellite use



BENEFITS OF MOTOROLA RECOMMENDED ALTERNATIVE PLAN

- All licensed PCS is within 1.8 GHz, eliminating need for higher cost dual-band subscriber units
- A number of license block options are possible
- The least congested microwave spectrum is divided equally between unlicensed PCS voice and data
- Both licensed and unlicensed PCS allocations exceed those proposed in the original NPRM
- The U.S. maintains the flexibility to allocate 2 GHz MSS bands consistent with those identified for global use in WARC-92
- The U.S. maintains credibility for future international negotiations

(M) MOTOROLA

LICENSED PCS OPTIONS:

$$2 - 40 + 2 - 10$$

$$2 - 30 + 4 - 10$$

$$2 - 30 + 2 - 20$$

$$3 - 30 + 1 - 10$$

$$2 - 30 + 1 - 20 + 2 - 10$$

$$3 - 25 + 2 - 12.5$$